

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Application by Verizon Pennsylvania
Inc., Verizon Long Distance, Verizon
Enterprise Solutions, Verizon Global
Networks Inc., and Verizon Select
Services Inc., for Authorization To
Provide In-Region, InterLATA Services
in Pennsylvania

CC Docket No. 01-138

**APPLICATION BY VERIZON PENNSYLVANIA
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN PENNSYLVANIA**

REPLY APPENDIX A

Volume 1

Reply Declarations

Attachment 2

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Washington, DC 20554

In the Matter of)	
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Application by Verizon Pennsylvania)	
Inc., Verizon Long Distance, Verizon)	
Enterprise Solutions, Verizon Global)	CC Docket No. 01-138
Networks Inc., and Verizon Select)	
Services Inc., for Authorization To)	
Provide In-Region, InterLATA Services)	
in Pennsylvania)	

REPLY DECLARATION OF PAUL A. LACOUTURE

AND

VIRGINIA P. RUESTERHOLZ

1. My name is Paul A. Lacouture. I submitted a Declaration with Virginia P. Ruesterholz in this proceeding on June 21, 2001. My qualifications are set forth in that declaration.

2. My name is Virginia P. Ruesterholz. I submitted a Declaration with Paul A. Lacouture in this proceeding on June 21, 2001. My qualifications are set forth in that declaration.

I. Purpose of Reply Declaration

3. The purpose of our reply declaration is to address the issues raised by commenters about whether Verizon's performance satisfies the checklist requirements in Section 271(c)(2)(B) of the Telecommunications Act of 1996. When these isolated challenges and unsupported assertions are placed in perspective and Verizon's performance data are presented fairly, it is evident that Verizon is meeting the checklist.

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the issue in the Sprint arbitration is whether Sprint should bear the additional costs created by that decision.

109. The issue is best illustrated through an example. Suppose a Verizon customer located in Allentown, Pennsylvania, calls a next door neighbor whose local service provider is Sprint. If Sprint has only one Point of Interconnection in the Philadelphia LATA and that Point of Interconnection is located in downtown Philadelphia, Verizon would have to carry that local call approximately 50 miles just to hand it off to Sprint for completion. Because of Sprint's chosen method of interconnection, there would be an additional 50 miles of transport costs associated with this local call. These additional transport costs would not exist if Sprint chose a more efficient method of interconnection, such as by establishing a Point of Interconnection in each local calling area in the LATA.

110. Verizon should not be required to bear additional transport costs simply because a CLEC has chosen a more costly and less efficient method of interconnection. Since these additional transport costs would be associated with the completion of a local call from Verizon's customer, Verizon would not be able to recover them by imposing toll charges. In fact, Verizon would typically not even be able to charge its customer any incremental charge for a local call to Sprint's customer because the bulk of Verizon's residential customers have flat-rated calling plans.

111. To resolve this issue in the ongoing Sprint arbitration proceeding, Verizon has proposed an arrangement for Verizon and Sprint to share the additional transport costs created by Sprint's decision to establish only a single Point of Interconnection in a LATA. Under this approach, Verizon would bear the transport costs of carrying local

calls from Verizon's end offices to Verizon's tandem switches or other designated locations. Sprint would then bear the cost of transporting local calls from Verizon's tandem switches and the designated locations to Sprint's chosen Point of Interconnection. Verizon's proposal would allow Sprint to make a business decision to establish only one Point of Interconnection per LATA, so long as Sprint bears at least some of the additional costs created by choosing that method of interconnection.

b. Collocation

112. Verizon's collocation performance in Pennsylvania is strong. In our initial declaration, we indicated that Verizon completed 100 percent of the physical collocation (traditional caged arrangements), SCOPE and CCOE jobs from February through April 2001 on time. We also indicated that Verizon completed the single virtual collocation arrangement it provisioned during those months on time. Additionally, we stated that from February through April 2001, Verizon completed 97.93 percent of the collocation augments provisioned during those months on time.

113. Verizon's collocation performance continues to be excellent. In May and June 2001, Verizon did not complete any traditional physical, CCOE, or virtual collocation arrangements. Verizon did complete 4 SCOPE arrangements on time during those months. In May, Verizon also completed on time 92 percent of the 37 collocation augments it provisioned. In June, Verizon completed 100 percent of the 13 collocation augments it provisioned on time. *See Attachment 37.*

114. As we indicated in our initial declaration, on May 24, 2001, the Pennsylvania PUC set new collocation provisioning intervals. *See Pennsylvania Public Utility Commission v. Verizon Pennsylvania Inc: Rhythms Links, Inc. v. Verizon*